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Sciences, Inc. and NeoGenesis, Inc.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

OSMOSIS LLC, a Colorado Limited Liability
Company,

Plaintiff ,
vs.

BIOREGENERATIVE SCIENCES, INC. a
Nevada Corporation; and NEOGENESIS,
INC., a Nevada Corporation.

Defendants.

CASE NO. 2:17-cv-02430-JAD-CWH

**STIPULATION AND PROPOSED ORDER
TO STAY UPCOMING CASE
DEADLINES AND DEADLINES TO
RESPOND TO OUTSTANDING
MOTIONS FOR 30 DAYS PENDING
SETTLEMENT**

IT IS HEREBY STIPULATED BY AND BETWEEN Plaintiff Osmosis, LLC (“Plaintiff”),
by and through its attorneys Eric Olsen, Esq. and Dylan T. Ciciliano, Esq. of Garman Turner Gordon
LLP, and Defendants BioRegenerative Sciences, Inc. and NeoGenesis, Inc. (collectively
“Defendants”) by and through their attorneys of record, Kurt R. Bonds, Esq. and Adam R. Knecht,
Esq. of Alverson Taylor & Sanders, and George Koons III, Esq. of Koons Law Group Ltd., that the
Parties do hereby stipulate and agree that all upcoming case deadlines and deadlines to respond to
outstanding motions be stayed for 30 days pending settlement of this matter as follows:

1 **A. INTRODUCTION**

2 The parties have been involved in settlement negotiations and have reached an agreement in
3 principle as to the full and final release of all claims and counterclaims in this matter. The parties are
4 discussing specific settlement terms and request the Court stay upcoming case deadlines in order that
5 the parties may draft a mutually agreeable settlement agreement and general release. No trial date has
6 been set in this matter.
7

8 **B. PENDING MOTIONS AND UPCOMING DEADLINES**

9 The parties have the following upcoming deadlines and pending motions, which they request
10 be stayed for 30 days from their current deadlines:
11

- 12 1. December 13, 2018: Defendants' response to Plaintiff's Motion to Dismiss Answer to
13 Complaint and Defendants' Counterclaim;
- 14 2. December 17, 2018: Plaintiff's responses to: (1) Defendants' Motion for Leave to
15 File Second Amended Answer and Second Amended Counterclaim; and (2) Defendants'
16 Emergency Motion to Extend Discovery Deadlines;
- 17 3. January 2, 2019: Deadline for dispositive motions;
- 18 4. January 7, 2019: Hearing on: (1) Plaintiff's Motion to Dismiss Answer to Complaint
19 and Defendants' Counterclaim; and (2) Defendants' Motion for Leave to File Second
20 Amended Answer and Second Amended Counterclaim.
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1 IT IS SO STIPULATED.

2 DATED this 12th day of December, 2018.

3 GARMAN TURNER GORDON LLP

4 /s/ Stephen A. Davis

5 ERIC OLSEN

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15 *Attorneys for Plaintiff Osmosis LLC*

16 DATED this 12th day of December, 2018.

17 /s/ Adam R. Knecht

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*Attorneys for Defendants Bioregenerative
Sciences, Inc. and Neogenesis*

ORDER

The above Stipulation to Stay Upcoming Case Deadlines and Deadlines to Respond to Outstanding Motions for 30 Days Pending Settlement is hereby GRANTED and the hearing currently scheduled for January 7, 2019 [ECF No. 45] is VACATED until further notice. The parties shall file a status update within 30 days of the entry of this order notifying the Court of any developments.

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: December 14, 2018